

Oak Ridge Reservation Local Oversight Committee
Oak Ridge, TN
Page 1 of 2



February 2, 2001

Gary S. Hartman
U.S. Department of Energy
Oak Ridge Operations, EM-912
P.O. Box 2001
Oak Ridge, TN 37831

Subject: Comments on the Draft Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge Y-12 Plant (December 2000; DOE/EIS-0309)

Dear Mr. Hartman:

The Oak Ridge Reservation (ORR) Local Oversight Committee, Inc. (LOC) has adopted the following position on the proposed construction of new facilities for two of Y-12's mission components, as analyzed in the subject document. In addition, the LOC Board has directed its Citizens' Advisory Panel to submit detailed comments on the draft Y-12 SWEIS under separate cover and endorses those comments.

The LOC Board strongly supports the modernization of existing usable facilities and construction of new facilities at Y-12. Our nation and the region are well served by a modern and secure infrastructure to support weapons manufacturing, refurbishment, and dismantling. Additionally, the storage of highly enriched uranium (HEU) is an appropriate mission for Y-12 and must be supported by appropriately designed and constructed facilities.

Consistent with this position, the LOC Board endorses Alternative 4 presented in the draft Y-12 SWEIS: construction and operation of a new Special Materials Complex and a new HEU Materials Facility.

The siting of the two proposed facilities, although not specified in the subject document, should be consistent with recommendations as presented in the *Final Report of the Oak Ridge Reservation End Use Working Group (EUWG) (July 1998)*. The first End Use recommendation for the Y-12 Plant specifically applies to the pending decision: "The western area of the Y-12 Plant is expected to remain controlled industrial property. As opportunity arises, national security activities should be concentrated in the western area to allow for the broadest possible use of the rest of the plant." Additionally, the Community Guidelines approved by the EUWG include, among others, recommendations that call for brownfield sites to be used for siting additional facilities instead of greenfield sites and that those structures unsuitable for future uses should be demolished expeditiously.

1/22

2/01

Anderson • Melgs • Rhea • Roane • City of Oak Ridge • Knox • Loudon • Morgan

136 S. Illinois Avenue, Suite 208 • Oak Ridge, Tennessee 37830 • Phone (423) 483-1333 • Fax (423) 482-6572 • E-mail: loc@icx.net

Comment No. 1

Issue Code: 22

Comment noted.

Comment No. 2

Issue Code: 01

DOE recognizes that Site 1 for the proposed Special Materials Complex is just outside the proposed and recommended development areas indicated in the EUWG report as the commentor notes. However, all of Site 1 is not a greenfield site. A portion of the site (about 10 acres) has been used as a construction lay-down area in the past, and although legacy contamination from prior Y-12 operation support activities is not expected (see Section 3.2.4.2), it cannot be ruled out without further extensive site testing. The ROD on the Y-12 SWEIS will identify DOE's decision and action on the Special Materials Complex and siting.

DOE uses screening criteria and appropriate weighting factors developed for each specific proposed project in identifying potential siting alternatives. The recommendations of the EUWG are considered in the siting criteria. Future modernization projects not included in the SWEIS would be subjected to appropriate site screening and evaluation to determine reasonable alternative sites to be analyzed under NEPA.

Oak Ridge Reservation Local Oversight Committee

Oak Ridge, TN

Page 2 of 2

G. S. Hartman
02/02/01
Page 2 of 2

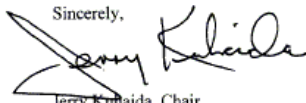
In addition, the SWEIS should consider the siting of the two facilities in the context of overall plans for Y-12 modernization, stated in the subject document to include "the eventual replacement or upgrade of all major production facilities that support the DP Mission." Furthermore, the SWEIS should discuss the potential impacts of the future modernization initiatives.

3/24

The LOC is a non-profit regional organization funded by the State of Tennessee and established to provide local government and citizen input into the environmental management and operation of the DOE's ORR. The Board of Directors of the LOC is composed of the elected and appointed officials of the seven surrounding counties and the City of Oak Ridge, and the Chair of the CAP. The CAP has up to 20 members with diverse backgrounds representing the greater ORR region; the CAP studies problems in depth and provides advice to the LOC Board and other governmental agencies.

The LOC appreciates the opportunity to provide input on the draft *SWEIS for the Oak Ridge Y-12 Plant*. If you have any questions on this matter, please direct them to the LOC office at 483-1333.

Sincerely,



Jerry Kufaida, Chair
Local Oversight Committee

cc: John Owsley, Director, TDEC DOE-O
Leah Dever, Manager, Oak Ridge Operations
Bill Brumley, Assistant Manager for Defense Programs, NNSA
Spencer Abraham, Secretary of Energy
Senator Bill Frist
Senator Fred Thompson
Representative Zach Wamp

Comment No. 3

Issue Code: 24

Sections 1.1.3 and 3.3 discuss the Y-12 Modernization Program. While the proposed HEU Materials Facility and the Special Materials Complex have progressed to the conceptual design level, other facilities at Y-12 being considered for modernization are still in the very early planning phase at this time. Table 3.3-1 provides a summary of the potential new facilities. None of potential future modification projects are included in the No Action - Planning Basis Operations Alternative. Two modernization projects are included in the action alternatives for the Y-12 HEU Storage Mission and Special Materials Mission as discussed in Sections 3.2.3, 3.2.4, and 3.2.5. As new modernization projects are proposed for Y-12, separate NEPA analyses would be conducted.